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September 12, 2022

**TO BE FILED UNDER SEAL  
VIA ECF**

The Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Trooper 1 v. New York State Police et al., (E.D.N.Y.), 22-cv-00893

Dear Judge DeArcy Hall:

I represent former Governor Andrew M. Cuomo and write in response to the Court's September 3, 2022 order regarding the Defendants' belated request on consent of all parties for a 72-hour extension to file reply briefs in further support of the Defendants' Motions to Dismiss. I apologize for the Defendants' belated request to extend the Tuesday, August 30 deadline, which was in contravention of the Court's individual rules. The belated request by all the Defendants was prompted because [REDACTED] on Sunday, August 28 and soon thereafter [REDACTED]

[REDACTED]. Once we contacted all counsel about this issue, our co-Defendants' counsel requested a similar extension so that both motions would remain on the same schedule, believing that would be most efficient for the parties and the Court. Plaintiff's counsel agreed to an extension on behalf of all the parties on Tuesday, August 29. The fact of [REDACTED], which is why the August 30 request did not mention the specific reason for the extension. In retrospect, we should have informed the Court of the reason by referencing that one of the attorneys experienced a sudden medical condition, which prompted the belated extension request. On behalf of all defense counsel, I apologize to the Court.

Sincerely,



Rita M. Glavin  
*Attorney for former Governor Andrew Cuomo*